

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
10

11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:  
15 ALL ACTIONS

**OMNIBUS SEALING STIPULATION  
AND [PROPOSED] ORDER  
REGARDING DKT. NOS. 1197-1198  
(JOINT LETTER BRIEF RE  
PLAINTIFFS' RFP NOS. 16 AND 18)**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

16  
17  
18  
19 Pursuant to Civil Local Rules 7-11 and 79-5, the Court's May 22, 2023 Protective Order  
20 (Dkt. No. 290), and the August 1, 2023 Order Granting Motion To File Under Seal; Setting  
21 Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively,  
22 "YouTube") and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation  
23 in connection with the Parties' Joint Letter Brief re Plaintiffs' RFP Nos. 16 and 18 and its exhibit  
24 filed on October 7, 2024. Dkt. Nos. 1197-1198.

25 At this time, Plaintiffs do not oppose the sealing request and reserve all rights to  
26 challenge designations and sealing in the future. Accordingly, the Parties stipulate to the  
27 following chart.  
28

**I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR PROVISIONAL REDACTIONS**

Dkt. No.	Description	Requested Action	Designating Party	Basis for Sealing	Whether Previously Sealed
1197	Joint Letter Brief	Maintain redactions at 2, 4	YouTube	Good cause exists to seal sensitive and confidential information about YouTube's internal research and marketing and business strategies. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou ("Chiou Decl.") at 2.	A party has not previously sought to seal the same information.
1197	Joint Letter Brief	Maintain redactions at 1	YouTube	Good cause exists to seal sensitive and confidential information about YouTube's confidential platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to	A party has not previously sought to seal the same information.

				YouTube. <i>See</i> Chiou Decl. at 2.	
1198-3	Exhibit A to Joint Letter Brief	Maintain redactions at 16:9-10, 16-17	YouTube	Good cause exists to seal sensitive and confidential information about YouTube's confidential platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Chiou Decl. at 2.	A party has not previously sought to seal the same information.

**IT IS SO STIPULATED AND AGREED.**

Respectfully submitted,

DATED: October 21, 2024

**WILSON SONSINI GOODRICH & ROSATI**

Professional Corporation

By: /s/ Christopher Chiou

Brian M. Willen (*pro hac vice*)

WILSON SONSINI GOODRICH & ROSATI PC

1301 Avenue of the Americas, 40th Floor

New York, New York 10019

Telephone: (212) 999-5800

Facsimile: (212) 999-5899

Email: bwillen@wsgr.com

Lauren Gallo White (State Bar No. 309075)

Samantha A. Machock (State Bar No. 298852)

WILSON SONSINI GOODRICH & ROSATI PC

One Market Plaza, Spear Tower, Suite 3300

San Francisco, CA 94105

Telephone: (415) 947-2000

Facsimile: (415) 947-2099

Email: lwhite@wsgr.com

Email: smachock@wsgr.com

Christopher Chiou (State Bar No. 233587)  
Matthew K. Donohue (State Bar No. 302144)  
WILSON SONSINI GOODRICH & ROSATI PC  
953 East Third Street, Suite 100  
Los Angeles, CA 90013  
Telephone: (323) 210-2900  
Facsimile: (866) 974-7329  
Email: cchiou@wsgr.com  
Email: mdonohue@wsgr.com

*Attorneys for Defendants YouTube, LLC and  
Google LLC*

DATED: October 21, 2024

By: /s/ Lexi J. Hazam  
LEXI J. HAZAM  
**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**  
275 Battery Street, 29<sup>th</sup> Floor  
San Francisco, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

PREVIN WARREN  
**MOTLEY RICE LLC**  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER  
**SEEGER WEISS, LLP**  
55 Challenger Road, 6<sup>th</sup> floor  
Ridgefield Park, NJ 07660  
Telephone: 973-639-9100  
Facsimile: 973-679-8656  
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement  
Counsel

JENNIE LEE ANDERSON  
**ANDRUS ANDERSON, LLP**  
155 Montgomery Street, Suite 900  
San Francisco, CA 94104  
Telephone: 415-986-1400  
jennie@andrusanderson.com

Liaison Counsel

JOSEPH G. VANZANDT  
**BEASLEY ALLEN CROW METHVIN  
PORTIS & MILES, P.C.**  
234 Commerce Street

1 Montgomery, AL 36103  
2 Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

3 EMILY C. JEFFCOTT  
4 **MORGAN & MORGAN**  
220 W. Garden Street, 9<sup>th</sup> Floor  
5 Pensacola, FL 32502  
Telephone: 850-316-9100  
6 ejeffcott@forthepeople.com

7 Federal/State Liaison Counsel

8 MATTHEW BERGMAN  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 Second Avenue, Suite 2100  
9 Seattle, WA 98104  
Telephone: 206-741-4862  
10 matt@socialmediavictims.org

11 JAMES J. BILSBORROW  
12 **WEITZ & LUXENBERG, PC**  
700 Broadway  
New York, NY 10003  
13 Telephone: 212-558-5500  
Facsimile: 212-344-5461  
14 jbilsborrow@weitzlux.com

15 JAYNE CONROY  
16 **SIMMONS HANLY CONROY, LLC**  
112 Madison Ave, 7<sup>th</sup> Floor  
New York, NY 10016  
17 Telephone: 917-882-5522  
jconroy@simmonsfirm.com

18 ANDRE MURA  
19 **GIBBS LAW GROUP, LLP**  
1111 Broadway, Suite 2100  
20 Oakland, CA 94607  
Telephone: 510-350-9717  
21 amm@classlawgroup.com

22 ALEXANDRA WALSH  
23 **WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
24 Telephone: 202-780-3014  
awalsh@alexwalshlaw.com

25 MICHAEL M. WEINKOWITZ  
26 **LEVIN SEDRAN & BERMAN, LLP**  
510 Walnut Street Suite 500  
27 Philadelphia, PA 19106  
Telephone: 215-592-1500  
28 mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN  
**RON AUSTIN LAW**  
400 MANHATTAN BLVD  
HARVEY, LA 70058  
Telephone: 504-227-8100  
raustin@ronaustinlaw.com

PAIGE BOLDT  
**WATTS GUERRA LLP**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
PBoldt@WattsGuerra.com

THOMAS P. CARTMELL  
**WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: 816-701 1100  
tcartmell@wcllp.com

SARAH EMERY  
**HENDY JOHNSON VAUGHN EMERY, PSC**  
2380 Grandview Drive  
Ft. Mitchell, KY 41017  
Telephone: 888-606-5297  
semery@justicestartshere.com

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: (646) 666-8908  
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.  
**HENDY JOHNSON VAUGHN EMERY, PSC**  
600 West Main Street, Suite 100  
Louisville, KY 40202  
Telephone: 859-578-4444  
rjohnson@justicestartshere.com

SIN-TING MARY LIU  
**AYLSTOCK WITKIN KREIS &  
OVERHOLTZ, PLLC**  
17 East Main Street, Suite 200  
Pensacola, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

JAMES MARSH  
**MARSH LAW FIRM PLLC**  
31 Hudson Yards, 11th floor  
New York, NY 10001-2170

Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

**HILLARY NAPPI**  
**HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212.213.8311  
hnappi@hrsclaw.com

**EMMIE PAULOS**  
**LEVIN PAPANTONIO RAFFERTY**  
316 South Baylen Street, Suite 600  
Pensacola, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

**RUTH THI RIZKALLA**  
**THE CARLSON LAW FIRM, P.C.**  
1500 Rosecrans Ave., Ste. 500  
Manhattan Beach, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

**ROLAND TELLIS**  
**DAVID FERNANDES**  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

**MELISSA YEATES**  
**JOSEPH E. MELTZER**  
**KESSLER TOPAZ MELTZER & CHECK, LLP**  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com  
jmeltzer@ktmc.com

**DIANDRA "FU" DEBROSSE ZIMMERMANN**  
**DICELLO LEVITT**  
505 20<sup>th</sup> St North Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205.855.5700  
fu@dicellolevitt.com

Plaintiffs' Steering Committee Membership

*Attorneys for Plaintiffs*

**ATTESTATION**

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 21, 2024

By: /s/ Christopher Chiou  
Christopher Chiou



**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**[PROPOSED] ORDER ON OMNIBUS  
SEALING STIPULATION  
REGARDING DKT. NOS. 1197-1198  
(JOINT LETTER BRIEF RE  
PLAINTIFFS' RFP NOS. 16 AND 18)**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting Sealing Procedures (Dkt. No. 341), and after consideration of the moving papers, supporting declaration, the arguments of counsel, and all other matters presented to the Court, the Court rules that good cause exists to seal portions of the following documents relating to Joint Letter Brief re Plaintiffs' RFP Nos. 16 and 18:

Dkt. No.	Description	Requested Action	Court's Ruling
1197	Joint Letter Brief	Maintain redactions at 2, 4	Granted _____ Denied _____

Dkt. No.	Description	Requested Action	Court's Ruling
1197	Joint Letter Brief	Maintain redactions at 1	Granted _____ Denied _____
1198-3	Exhibit A to Joint Letter Brief	Maintain redactions at 16:9-10, 16-17	Granted _____ Denied _____

**IT IS SO ORDERED.**

DATE:

\_\_\_\_\_  
Hon. Peter H. Kang  
United States District Judge